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November 12, 2010

VIA UPS OVERNIGHT DELIVERY

Gail Mitchell, Deputy Director
Water Protection Division
U.S. EPA Region 4
Atlanta Federal Center
61 Forsyth Street
Atlanta, Georgia 30303-8960

**Re: October 6, 2009, Information Request – Section 308 of the Clean
Water Act - Dalton Utilities Land Application System**

2010 NOV 16 P 12:25

Dear Ms. Mitchell:

This letter provides information from Dalton Utilities in connection with its ongoing responses to EPA's October 6, 2009, Section 308 of the Clean Water Act request (the "Request") addressed to Mr. Don Cope, President and CEO of Dalton Utilities. The enclosure is a letter dated November 11, 2010, with a certification signed pursuant to the Request in response to Paragraph 3 of Enclosure A of the Request, which includes the final sampling results for the **Composted Biosolids Monitoring Plan**.

Please contact me if have any questions regarding the information supplied pursuant to the Request.

Sincerely,



Lee A. DeHihns, III

LAD:gba
Enclosure

LEGAL02/31578197v25



November 11, 2010

Ms. Gail Mitchell, Deputy Director
Clean Water Enforcement Branch
Water Protection Division
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Atlanta, GA 30303-8960

Re: Information Request Pursuant to Section 308 of the Clean Water Act
Analytical Sample Results

Dear Ms. Mitchell,

In accordance with the Information Request pursuant to Section 308 of the Clean Water Act dated October 6, 2009, Dalton Utilities is submitting the final analytical results received for the sampling conducted as outlined in Dalton Utilities' Composted Biosolids Monitoring Plan. The final sampling event for the on-site inventory of finished compost occurred on October 12, 2010. The results of this sampling event are contained in Attachment A which is provided herein as a bound report titled Test America Laboratories, Inc. Analytical Report on Perfluorocarbon (PFC) Analysis Job # 280-8415 which contains 240 pages.

As Dalton Utilities has fulfilled all obligations noted in the EPA's Information Request pursuant to Section 308 of the Clean Water Act dated October 6, 2009 (the "Request"), this correspondence will be our final submittal.

If you have any questions, please contact me at 706-529-1091 or dcope@dutil.com.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false

Ms. Gail Mitchell
November 11, 2010
Page 2 of 2

information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,



Don Cope
President & CEO

Attachment

- c: Mr. Allen Barnes, Georgia Environmental Protection Division (cover letter only)
- Dr. Marlin Gottschalk, Sustainability Division Georgia Department of Natural Resources (cover letter only)
- Dr. Becky Champion, Georgia Environmental Protection Division (cover letter only)
- Dr. Bert Langley, Georgia Environmental Protection Division (cover letter only)
- Lee A. DeHihns, Esq.

TestAmerica

THE LEADER IN ENVIRONMENTAL TESTING

TestAmerica

ANALYTICAL REPORT

Job Number: 280-8415-1

Job Description: PFC Analysis

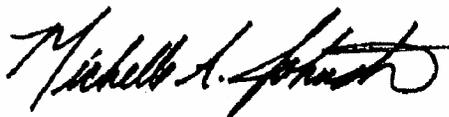
For:

Dalton Utilities

1200 V.D. Parrott Jr. Parkway

Dalton, GA 30721

Attention: Ms. Dena Haverland



Approved for release.
Michelle Johnston
Project Manager I
10/22/2010 8:24 AM

Michelle Johnston

Project Manager I

michelle.johnston@testamericainc.com

10/22/2010

The test results in this report relate only to the samples in this report and meet all requirements of NELAP, with any exceptions noted. Pursuant to NELAP, this report shall not be reproduced except in full, without the written approval of the laboratory. All questions regarding this report should be directed to the TestAmerica Denver Project Manager.

The Lab Certification ID# is E87667.

Reporting limits are adjusted for sample size used, dilutions and moisture content if applicable.

TestAmerica Laboratories, Inc.

TestAmerica Denver 4955 Yarrow Street, Arvada, CO 80002

Tel (303) 736-0100 Fax (303) 431-7171 www.testamericainc.com



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CASE NARRATIVE
Client: Dalton Utilities
Project: PFC Analysis
Report Number: 280-8415-1

With the exceptions noted as flags or footnotes, standard analytical protocols were followed in the analysis of the samples and no problems were encountered or anomalies observed. In addition all laboratory quality control samples were within established control limits, with any exceptions noted below. Each sample was analyzed to achieve the lowest possible reporting limit within the constraints of the method. In some cases, due to interference or analytes present at high concentrations, samples were diluted. For diluted samples, the reporting limits are adjusted relative to the dilution required.

Calculations are performed before rounding to avoid round-off errors in calculated results.

All holding times were met and proper preservation noted for the methods performed on these samples, unless otherwise detailed in the individual sections below.

The PFC method DV-LC-0012 is an isotope dilution method; therefore, the internal standards are added prior to the extraction process. This technique inherently corrects for variability in the extraction efficiency due to sample matrix. Dilution of samples beyond the ability of the instrument to detect the internal standards is not recommended. Analyses performed at a dilution level requiring additional internal standard to be added after the extraction step in order to quantitate results has been shown to yield results with a significant low bias. As a result, data have been reported that exceed the calibration range and are qualified as estimated.

The PFC method is an isotope dilution method where the internal standards are added prior to extraction and used to quantitate results; therefore, the use of dilution factors is inappropriate. Application of dilution factors would yield results that are artificially high. Reporting limits and method detection limits are not adjusted for dilutions unless samples are fortified with additional internal standard, which is not recommended.

Internal standard abundances may vary depending upon both recovery and the dilution at which the analysis is performed. This is an inherent feature of the isotope dilution technique and is not indicative of bias to the reported results.

Receipt

The following report contains the analytical results for six soil samples received at TestAmerica Denver on October 14, 2010, according to documented sample acceptance procedures. The samples were received in good condition at a temperature of 3.3°C. No anomalies were encountered during sample receipt.

PFC

Samples AA2 18 MONTH (280-8415-1), AB5 12 MONTH (280-8415-2), AB13 6 MONTH (280-8415-3), AA2 18 MONTH (280-8415-4), AB5 12 MONTH (280-8415-5) and AB13 6 MONTH (280-8415-6) were analyzed for PFC in accordance with SOP DV-LC-0012. The samples were prepared on 10/15/2010 and analyzed on 10/19/2010.

Each sample is analyzed to achieve the lowest possible reporting limits within the constraints of the method. Due to high concentrations of target analytes, samples AA2 18 MONTH (280-8415-1), AB5 12 MONTH (280-8415-2), AB13 6 MONTH (280-8415-3), AA2 18 MONTH (280-8415-4), AB5 12 MONTH (280-8415-5) and AB13 6 MONTH (280-8415-6) had to be analyzed at 5X dilutions. Internal standards (IS) were not fortified, therefore, the IS percent recoveries need to be multiplied by 5 and the MDLs/RLs were not updated due to limitations in the software.

Perfluorobutanoic acid (PFBA) was detected in method blank MB 280-35882/1-A at a level less than one half the reporting limit; therefore, corrective action is deemed unnecessary. The value should be considered an estimate, and has been flagged "J". If the associated sample reported a result above the MDL and/or RL, the result has been "B" flagged.

The MS/MSD analyses associated with prep batch 280-35882 was performed on sample 280-8066-6. The MS and MSD exhibited spike compound recoveries and/or RPD data outside the control limits for Perfluorotetradecanoic acid (PFTeA) and Perfluorotridecanoic acid (PFTriA). The acceptable LCS analysis data indicated that the analytical system was operating within control; therefore, corrective action is deemed unnecessary.

Internal standard responses were outside the control limits for samples AA2 18 MONTH (280-8415-1), AB5 12 MONTH (280-8415-2), AB13 6 MONTH (280-8415-3), AA2 18 MONTH (280-8415-4), AB5 12 MONTH (280-8415-5), AB13 6 MONTH (280-8415-6) and for the MS/MSD associated with prep batch 280-35882. The samples show evidence of matrix and target analyte interferences. This is an isotope dilution method and the samples were diluted 5X without fortifying the internal standards. This means the internal standards were also diluted and the recoveries could not be accurately calculated.

Refer to the QC report for details.

No other difficulties were encountered during the PFC analyses.

All other quality control parameters were within the acceptance limits.

Percent Solids

Samples AA2 18 MONTH (280-8415-1), AB5 12 MONTH (280-8415-2), AB13 6 MONTH (280-8415-3), AA2 18 MONTH (280-8415-4), AB5 12 MONTH (280-8415-5) and AB13 6 MONTH (280-8415-6) were analyzed for percent solids in accordance with EPA SW846 9003. The samples were analyzed on 10/15/2010.

No difficulties were encountered during the % solids analyses.

All quality control parameters were within the acceptance limits.

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LCMS MANUAL INTEGRATION SUMMARY

Lab Name: TestAmerica Denver Job No.: 280-8415-1

SDG No.:

Instrument ID: LC_LCMS5 Analysis Batch Number: 36351

Lab Sample ID: STD0002 280-36351/1 IC Client Sample ID:

Date Analyzed: 10/19/10 01:09 Lab File ID: pc50J18b005.d GC Column: Gemini-NX ID:

10-21-10

Sme

COMPOUND NAME	RETENTION TIME	MANUAL INTEGRATION	
		REASON	ANALYST DATE
Perfluorobutane Sulfonate (PFBS)	4.83	Baseline	williamst 10/19/10 12:12
Perfluorohexanoic acid (PFHxA)	5.31	Assign Peak	williamst 10/19/10 12:11

Lab Sample ID: STD0005 280-36351/2 IC Client Sample ID:

Date Analyzed: 10/19/10 01:22 Lab File ID: pc50J18b006.d GC Column: Gemini-NX ID:

COMPOUND NAME	RETENTION TIME	MANUAL INTEGRATION	
		REASON	ANALYST DATE
Perfluorobutane Sulfonate (PFBS)	4.84	Baseline	williamst 10/19/10 12:11

Lab Sample ID: STD0020 280-36351/4 Client Sample ID:

Date Analyzed: 10/19/10 01:48 Lab File ID: pc50J18b008.d GC Column: Gemini-NX ID:

COMPOUND NAME	RETENTION TIME	MANUAL INTEGRATION	
		REASON	ANALYST DATE
Perfluorobutane Sulfonate (PFBS)	4.84	Baseline	williamst 10/19/10 12:12

Lab Sample ID: STD1250 280-36351/9 IC Client Sample ID:

Date Analyzed: 10/19/10 02:54 Lab File ID: pc50J18b013.d GC Column: Gemini-NX ID:

COMPOUND NAME	RETENTION TIME	MANUAL INTEGRATION	
		REASON	ANALYST DATE
Perfluorobutanoic acid (PFBA)	3.63	Baseline	williamst 10/19/10 12:13
Perfluoropentanoic acid (PFPA)	4.72	Baseline	williamst 10/19/10 12:13

2 of 3

LCMS MANUAL INTEGRATION SUMMARY

Lab Name: TestAmerica Denver Job No.: 280-8415-1
 SDG No.:
 Instrument ID: LC_LCMS5 Analysis Batch Number: 36351
 Lab Sample ID: ICV 280-36351/11 Client Sample ID:
 Date Analyzed: 10/19/10 03:20 Lab File ID: pc50J18b015.d GC Column: Gemini-NX ID:

COMPOUND NAME	RETENTION TIME		MANUAL INTEGRATION	
	REASON	ANALYST	DATE	
Perfluorobutanoic acid (PFBA)	3.63 Baseline	williamst	10/19/10 12:27	
Perfluorobutane Sulfonate (PFBS)	4.84 Baseline	williamst	10/19/10 12:27	

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LCMS MANUAL INTEGRATION SUMMARY

Lab Name: TestAmerica Denver

Job No.: 280-8415-1

SDG No.:

Instrument ID: LC_LCMS5

Analysis Batch Number: 36437

Lab Sample ID: CCV 280-36437/63

Client Sample ID:

Date Analyzed: 10/19/10 19:08

Lab File ID: pc50J18b107.d

GC Column: Gemini-NX

ID:

COMPOUND NAME	RETENTION TIME	MANUAL INTEGRATION	
		REASON	ANALYST DATE
13C4 PFBA (IS)	3.57	Baseline	williamst 10/20/10 06:59

LCMS MANUAL INTEGRATION SUMMARY

Lab Name: TestAmerica Denver Job No.: 280-8415-1

SDG No.:

Instrument ID: LC_LCMS5 Analysis Batch Number: 36351

Lab Sample ID: STD0002 280-36351/1 IC Client Sample ID:

Date Analyzed: 10/19/10 01:09 Lab File ID: pc50J18b005.d GC Column: Gemini-NX ID:

COMPOUND NAME	RETENTION TIME	MANUAL INTEGRATION	
		REASON	ANALYST DATE
Perfluorobutane Sulfonate (PFBS)	4.83	Baseline	williamst 10/19/10 12:12
Perfluorohexanoic acid (PFHxA)	5.31	Assign Peak	williamst 10/19/10 12:11

Lab Sample ID: STD0005 280-36351/2 IC Client Sample ID:

Date Analyzed: 10/19/10 01:22 Lab File ID: pc50J18b006.d GC Column: Gemini-NX ID:

COMPOUND NAME	RETENTION TIME	MANUAL INTEGRATION	
		REASON	ANALYST DATE
Perfluorobutane Sulfonate (PFBS)	4.84	Baseline	williamst 10/19/10 12:11

Lab Sample ID: STD0020 280-36351/4 Client Sample ID:

Date Analyzed: 10/19/10 01:48 Lab File ID: pc50J18b008.d GC Column: Gemini-NX ID:

COMPOUND NAME	RETENTION TIME	MANUAL INTEGRATION	
		REASON	ANALYST DATE
Perfluorobutane Sulfonate (PFBS)	4.84	Baseline	williamst 10/19/10 12:12

Lab Sample ID: STD1250 280-36351/9 IC Client Sample ID:

Date Analyzed: 10/19/10 02:54 Lab File ID: pc50J18b013.d GC Column: Gemini-NX ID:

COMPOUND NAME	RETENTION TIME	MANUAL INTEGRATION	
		REASON	ANALYST DATE
Perfluorobutanoic acid (PFBA)	3.63	Baseline	williamst 10/19/10 12:13
Perfluoropentanoic acid (PFPA)	4.72	Baseline	williamst 10/19/10 12:13

LCMS MANUAL INTEGRATION SUMMARY

Lab Name: TestAmerica Denver Job No.: 280-8415-1
 SDG No.:
 Instrument ID: LC_LCMS5 Analysis Batch Number: 36351
 Lab Sample ID: ICV 280-36351/11 Client Sample ID:
 Date Analyzed: 10/19/10 03:20 Lab File ID: pc50Jl8b015.d GC Column: Gemini-NX ID:

COMPOUND NAME	RETENTION TIME	MANUAL INTEGRATION	
		REASON	ANALYST DATE
Perfluorobutanoic acid (PFBA)	3.63	Baseline	williamst 10/19/10 12:27
Perfluorobutane Sulfonate (PFBS)	4.84	Baseline	williamst 10/19/10 12:27

LCMS MANUAL INTEGRATION SUMMARY

Lab Name: TestAmerica Denver Job No.: 280-8415-1
 SDG No.: _____
 Instrument ID: LC_LCMS5 Analysis Batch Number: 36437
 Lab Sample ID: CCV 280-36437/63 Client Sample ID: _____
 Date Analyzed: 10/19/10 19:08 Lab File ID: pc50J18b107.d GC Column: Gemini-NX ID: _____

COMPOUND NAME	RETENTION TIME	MANUAL INTEGRATION	
		REASON	ANALYST
13C4 PFBA (IS)	3.57	Baseline	williamst
			10/20/10 06:59

SAMPLE SUMMARY

Client: Dalton Utilities

Job Number: 280-8415-1

Lab Sample ID	Client Sample ID	Client Matrix	Date/Time Sampled	Date/Time Received
280-8415-1	AA2 18 MONTH	Solid	10/12/2010 1401	10/14/2010 0900
280-8415-2	AB5 12 MONTH	Solid	10/12/2010 1416	10/14/2010 0900
280-8415-3	AB13 6 MONTH	Solid	10/12/2010 1428	10/14/2010 0900
280-8415-4	AA2 18 MONTH	Solid	10/12/2010 1401	10/14/2010 0900
280-8415-5	AB5 12 MONTH	Solid	10/12/2010 1416	10/14/2010 0900
280-8415-6	AB13 6 MONTH	Solid	10/12/2010 1428	10/14/2010 0900

EXECUTIVE SUMMARY - Detections

Client: Dalton Utilities

Job Number: 280-8415-1

Lab Sample ID Analyte	Client Sample ID	Result / Qualifier	Reporting Limit	Units	Method
280-8415-1		AA2 18 MONTH			
Perfluorobutane Sulfonate (PFBS)		1600	3.4	ug/Kg	DV-LC-0012
Perfluorobutanoic acid (PFBA)		240	3.4	ug/Kg	DV-LC-0012
Perfluorodecanoic acid (PFDA)		3300	3.4	ug/Kg	DV-LC-0012
Perfluorododecanoic acid (PFDoA)		720	8.6	ug/Kg	DV-LC-0012
Perfluoroheptanoic acid (PFHpA)		490	3.4	ug/Kg	DV-LC-0012
Perfluorohexane Sulfonate (PFHxS)		13	3.4	ug/Kg	DV-LC-0012
Perfluorohexanoic acid (PFHxA)		450	3.4	ug/Kg	DV-LC-0012
Perfluorononanoic acid (PFNA)		850	3.4	ug/Kg	DV-LC-0012
Perfluorooctane Sulfonamide (FOSA)		500	8.6	ug/Kg	DV-LC-0012
Perfluorooctanoic acid (PFOA)		2800	8.6	ug/Kg	DV-LC-0012
Perfluorooctane Sulfonate (PFOS)		680	3.4	ug/Kg	DV-LC-0012
Perfluoropentanoic acid (PFPA)		470	3.4	ug/Kg	DV-LC-0012
Perfluorotetradecanoic acid (PFTeA)		130	8.6	ug/Kg	DV-LC-0012
Perfluorotridecanoic Acid (PFTriA)		480	8.6	ug/Kg	DV-LC-0012
Perfluoroundecanoic acid (PFUnA)		1300	8.6	ug/Kg	DV-LC-0012
Percent Moisture		44	0.10	%	D-2216
280-8415-2		AB5 12 MONTH			
Perfluorobutane Sulfonate (PFBS)		1500	2.9	ug/Kg	DV-LC-0012
Perfluorobutanoic acid (PFBA)		160	2.9	ug/Kg	DV-LC-0012
Perfluorodecanoic acid (PFDA)		2000	2.9	ug/Kg	DV-LC-0012
Perfluorododecanoic acid (PFDoA)		480	7.3	ug/Kg	DV-LC-0012
Perfluoroheptanoic acid (PFHpA)		330	2.9	ug/Kg	DV-LC-0012
Perfluorohexane Sulfonate (PFHxS)		21	2.9	ug/Kg	DV-LC-0012
Perfluorohexanoic acid (PFHxA)		310	2.9	ug/Kg	DV-LC-0012
Perfluorononanoic acid (PFNA)		460	2.9	ug/Kg	DV-LC-0012
Perfluorooctane Sulfonamide (FOSA)		1200	7.3	ug/Kg	DV-LC-0012
Perfluorooctanoic acid (PFOA)		1900	7.3	ug/Kg	DV-LC-0012
Perfluorooctane Sulfonate (PFOS)		1200	2.9	ug/Kg	DV-LC-0012
Perfluoropentanoic acid (PFPA)		300	2.9	ug/Kg	DV-LC-0012
Perfluorotetradecanoic acid (PFTeA)		88	7.3	ug/Kg	DV-LC-0012
Perfluorotridecanoic Acid (PFTriA)		290	7.3	ug/Kg	DV-LC-0012
Perfluoroundecanoic acid (PFUnA)		870	7.3	ug/Kg	DV-LC-0012
Percent Moisture		33	0.10	%	D-2216

EXECUTIVE SUMMARY - Detections

Client: Dalton Utilities

Job Number: 280-8415-1

Lab Sample ID	Client Sample ID	Analyte	Result / Qualifier	Reporting Limit	Units	Method
280-8415-3	AB13 6 MONTH					
		Perfluorobutane Sulfonate (PFBS)	2700	4.5	ug/Kg	DV-LC-0012
		Perfluorobutanoic acid (PFBA)	310	4.5	ug/Kg	DV-LC-0012
		Perfluorodecanoic acid (PFDA)	2600	4.5	ug/Kg	DV-LC-0012
		Perfluorododecanoic acid (PFDoA)	460	11	ug/Kg	DV-LC-0012
		Perfluoroheptanoic acid (PFHpA)	400	4.5	ug/Kg	DV-LC-0012
		Perfluorohexanoic acid (PFHxA)	510	4.5	ug/Kg	DV-LC-0012
		Perfluorononanoic acid (PFNA)	590	4.5	ug/Kg	DV-LC-0012
		Perfluorooctane Sulfonamide (FOSA)	250	11	ug/Kg	DV-LC-0012
		Perfluorooctanoic acid (PFOA)	2700	11	ug/Kg	DV-LC-0012
		Perfluorooctane Sulfonate (PFOS)	570	4.5	ug/Kg	DV-LC-0012
		Perfluoropentanoic acid (PFPA)	450	4.5	ug/Kg	DV-LC-0012
		Perfluorotetradecanoic acid (PFTeA)	84	11	ug/Kg	DV-LC-0012
		Perfluorotridecanoic Acid (PFTriA)	390	11	ug/Kg	DV-LC-0012
		Perfluoroundecanoic acid (PFUnA)	1100	11	ug/Kg	DV-LC-0012
		Percent Moisture	57	0.10	%	D-2216
280-8415-4	AA2 18 MONTH					
		Perfluorobutane Sulfonate (PFBS)	1300	3.2	ug/Kg	DV-LC-0012
		Perfluorobutanoic acid (PFBA)	170	3.2	ug/Kg	DV-LC-0012
		Perfluorodecanoic acid (PFDA)	2300	3.2	ug/Kg	DV-LC-0012
		Perfluorododecanoic acid (PFDoA)	500	7.9	ug/Kg	DV-LC-0012
		Perfluoroheptanoic acid (PFHpA)	360	3.2	ug/Kg	DV-LC-0012
		Perfluorohexane Sulfonate (PFHxS)	9.2	3.2	ug/Kg	DV-LC-0012
		Perfluorohexanoic acid (PFHxA)	350	3.2	ug/Kg	DV-LC-0012
		Perfluorononanoic acid (PFNA)	590	3.2	ug/Kg	DV-LC-0012
		Perfluorooctane Sulfonamide (FOSA)	270	7.9	ug/Kg	DV-LC-0012
		Perfluorooctanoic acid (PFOA)	2100	7.9	ug/Kg	DV-LC-0012
		Perfluorooctane Sulfonate (PFOS)	410	3.2	ug/Kg	DV-LC-0012
		Perfluoropentanoic acid (PFPA)	360	3.2	ug/Kg	DV-LC-0012
		Perfluorotetradecanoic acid (PFTeA)	100	7.9	ug/Kg	DV-LC-0012
		Perfluorotridecanoic Acid (PFTriA)	360	7.9	ug/Kg	DV-LC-0012
		Perfluoroundecanoic acid (PFUnA)	900	7.9	ug/Kg	DV-LC-0012
		Percent Moisture	38	0.10	%	D-2216

EXECUTIVE SUMMARY - Detections

Client: Dalton Utilities

Job Number: 280-8415-1

Lab Sample ID	Client Sample ID		Reporting		
Analyte		Result / Qualifier	Limit	Units	Method
280-8415-5	AB5 12 MONTH				
Perfluorobutane Sulfonate (PFBS)		1400	2.7	ug/Kg	DV-LC-0012
Perfluorobutanoic acid (PFBA)		150 B	2.7	ug/Kg	DV-LC-0012
Perfluorodecanoic acid (PFDA)		1700	2.7	ug/Kg	DV-LC-0012
Perfluorododecanoic acid (PFDoA)		390	6.6	ug/Kg	DV-LC-0012
Perfluoroheptanoic acid (PFHpA)		290	2.7	ug/Kg	DV-LC-0012
Perfluorohexane Sulfonate (PFHxS)		21	2.7	ug/Kg	DV-LC-0012
Perfluorohexanoic acid (PFHxA)		250	2.7	ug/Kg	DV-LC-0012
Perfluorononanoic acid (PFNA)		400	2.7	ug/Kg	DV-LC-0012
Perfluorooctane Sulfonamide (FOSA)		790	6.6	ug/Kg	DV-LC-0012
Perfluorooctanoic acid (PFOA)		1700	6.6	ug/Kg	DV-LC-0012
Perfluorooctane Sulfonate (PFOS)		950	2.7	ug/Kg	DV-LC-0012
Perfluoropentanoic acid (PFPA)		250	2.7	ug/Kg	DV-LC-0012
Perfluorotetradecanoic acid (PFTeA)		71	6.6	ug/Kg	DV-LC-0012
Perfluorotridecanoic Acid (PFTriA)		250	6.6	ug/Kg	DV-LC-0012
Perfluoroundecanoic acid (PFUnA)		700	6.6	ug/Kg	DV-LC-0012
Percent Moisture		30	0.10	%	D-2216
280-8415-6	AB13 6 MONTH				
Perfluorobutane Sulfonate (PFBS)		2400	4.8	ug/Kg	DV-LC-0012
Perfluorobutanoic acid (PFBA)		320 B	4.8	ug/Kg	DV-LC-0012
Perfluorodecanoic acid (PFDA)		2300	4.8	ug/Kg	DV-LC-0012
Perfluorododecanoic acid (PFDoA)		440	12	ug/Kg	DV-LC-0012
Perfluoroheptanoic acid (PFHpA)		360	4.8	ug/Kg	DV-LC-0012
Perfluorohexane Sulfonate (PFHxS)		5.6	4.8	ug/Kg	DV-LC-0012
Perfluorohexanoic acid (PFHxA)		480	4.8	ug/Kg	DV-LC-0012
Perfluorononanoic acid (PFNA)		530	4.8	ug/Kg	DV-LC-0012
Perfluorooctane Sulfonamide (FOSA)		190	12	ug/Kg	DV-LC-0012
Perfluorooctanoic acid (PFOA)		2300	12	ug/Kg	DV-LC-0012
Perfluorooctane Sulfonate (PFOS)		500	4.8	ug/Kg	DV-LC-0012
Perfluoropentanoic acid (PFPA)		480	4.8	ug/Kg	DV-LC-0012
Perfluorotetradecanoic acid (PFTeA)		86	12	ug/Kg	DV-LC-0012
Perfluorotridecanoic Acid (PFTriA)		400	12	ug/Kg	DV-LC-0012
Perfluoroundecanoic acid (PFUnA)		980	12	ug/Kg	DV-LC-0012
Percent Moisture		61	0.10	%	D-2216

METHOD SUMMARY

Client: Dalton Utilities

Job Number: 280-8415-1

Description	Lab Location	Method	Preparation Method
Matrix: Solid			
Perfluorinated Hydrocarbons	TAL DEN	TAL-DEN DV-LC-0012	
Leaching procedure for PFCs	TAL DEN		TAL-DEN PFC leach
ASTM D-2216	TAL DEN	ASTM D-2216	

Lab References:

TAL DEN = TestAmerica Denver

Method References:

ASTM = ASTM International

TAL-DEN = TestAmerica Laboratories, Denver, Facility Standard Operating Procedure.

METHOD / ANALYST SUMMARY

Client: Dalton Utilities

Job Number: 280-8415-1

Method	Analyst	Analyst ID
TAL-DEN DV-LC-0012	Williams, Teresa L	TLW
ASTM D-2216	Berry III, Paul B	PBB

Analytical Data

Client: Dalton Utilities

Job Number: 280-8415-1

Client Sample ID: AA2 18 MONTH

Lab Sample ID: 280-8415-1

Date Sampled: 10/12/2010 1401

Client Matrix: Solid

% Moisture: 43.9

Date Received: 10/14/2010 0900

DV-LC-0012 Perfluorinated Hydrocarbons

Method:	DV-LC-0012	Analysis Batch: 280-36437	Instrument ID:	LC_LCMS5
Preparation:	PFC leach	Prep Batch: 280-35882	Lab File ID:	pc50J18b101.d
Dilution:	1.0		Initial Weight/Volume:	10.35 g
Date Analyzed:	10/19/2010 1751		Final Weight/Volume:	50 mL
Date Prepared:	10/15/2010 0854		Injection Volume:	25 uL

Analyte	DryWt Corrected: Y	Result (ug/Kg)	Qualifier	MDL	RL
Perfluorobutane Sulfonate (PFBS)		1600		1.4	3.4
Perfluorobutanoic acid (PFBA)		240	B	0.59	3.4
Perfluorodecanoic acid (PFDA)		3300		1.3	3.4
Perfluorododecanoic acid (PFDoA)		720		1.4	8.6
Perfluoroheptanoic acid (PFHpA)		490		1.2	3.4
Perfluorohexane Sulfonate (PFHxS)		13		1.3	3.4
Perfluorohexanoic acid (PFHxA)		450		0.35	3.4
Perfluorononanoic acid (PFNA)		850		0.86	3.4
Perfluorooctane Sulfonamide (FOSA)		500		2.1	8.6
Perfluorooctanoic acid (PFOA)		2800		1.7	8.6
Perfluorooctane Sulfonate (PFOS)		680		0.65	3.4
Perfluoropentanoic acid (PFPA)		470		1.5	3.4
Perfluorotetradecanoic acid (PFTeA)		130		2.5	8.6
Perfluorotridecanoic Acid (PFTriA)		480		2.0	8.6
Perfluoroundecanoic acid (PFUnA)		1300		3.1	8.6

Surrogate	%Rec	Qualifier	Acceptance Limits
13C8 PFOA	107		57 - 153
13C8 PFOS	89		70 - 130

Analytical Data

Client: Dalton Utilities

Job Number: 280-8415-1

Client Sample ID: **AB5 12 MONTH**

Lab Sample ID: 280-8415-2

Date Sampled: 10/12/2010 1416

Client Matrix: Solid

% Moisture: 32.9

Date Received: 10/14/2010 0900

DV-LC-0012 Perfluorinated Hydrocarbons

Method:	DV-LC-0012	Analysis Batch: 280-36437	Instrument ID:	LC_LCMS5
Preparation:	PFC leach	Prep Batch: 280-35882	Lab File ID:	pc50J18b102.d
Dilution:	1.0		Initial Weight/Volume:	10.21 g
Date Analyzed:	10/19/2010 1804		Final Weight/Volume:	50 mL
Date Prepared:	10/15/2010 0854		Injection Volume:	25 uL

Analyte	DryWt Corrected: Y	Result (ug/Kg)	Qualifier	MDL	RL
Perfluorobutane Sulfonate (PFBS)		1500		1.2	2.9
Perfluorobutanoic acid (PFBA)		160	B	0.50	2.9
Perfluorodecanoic acid (PFDA)		2000		1.1	2.9
Perfluorododecanoic acid (PFDoA)		480		1.2	7.3
Perfluoroheptanoic acid (PFHpA)		330		1.1	2.9
Perfluorohexane Sulfonate (PFHxS)		21		1.1	2.9
Perfluorohexanoic acid (PFHxA)		310		0.29	2.9
Perfluorononanoic acid (PFNA)		460		0.73	2.9
Perfluorooctane Sulfonamide (FOSA)		1200		1.8	7.3
Perfluorooctanoic acid (PFOA)		1900		1.5	7.3
Perfluorooctane Sulfonate (PFOS)		1200		0.55	2.9
Perfluoropentanoic acid (PFPA)		300		1.3	2.9
Perfluorotetradecanoic acid (PFTeA)		88		2.1	7.3
Perfluorotridecanoic Acid (PFTriA)		290		1.7	7.3
Perfluoroundecanoic acid (PFUnA)		870		2.6	7.3

Surrogate	%Rec	Qualifier	Acceptance Limits
13C8 PFOA	111		57 - 153
13C8 PFOS	106		70 - 130

Analytical Data

Client: Dalton Utilities

Job Number: 280-8415-1

Client Sample ID: AB13 6 MONTH

Lab Sample ID: 280-8415-3

Date Sampled: 10/12/2010 1428

Client Matrix: Solid

% Moisture: 57.3

Date Received: 10/14/2010 0900

DV-LC-0012 Perfluorinated Hydrocarbons

Method:	DV-LC-0012	Analysis Batch: 280-36437	Instrument ID:	LC_LCMS5
Preparation:	PFC leach	Prep Batch: 280-35882	Lab File ID:	pc50J18b103.d
Dilution:	1.0		Initial Weight/Volume:	10.40 g
Date Analyzed:	10/19/2010 1816		Final Weight/Volume:	50 mL
Date Prepared:	10/15/2010 0854		Injection Volume:	25 uL

Analyte	DryWt Corrected: Y	Result (ug/Kg)	Qualifier	MDL	RL
Perfluorobutane Sulfonate (PFBS)		2700		1.9	4.5
Perfluorobutanoic acid (PFBA)		310	B	0.77	4.5
Perfluorodecanoic acid (PFDA)		2600		1.7	4.5
Perfluorododecanoic acid (PFDoA)		460		1.8	11
Perfluoroheptanoic acid (PFHpA)		400		1.6	4.5
Perfluorohexane Sulfonate (PFHxS)		ND		1.7	4.5
Perfluorohexanoic acid (PFHxA)		510		0.45	4.5
Perfluorononanoic acid (PFNA)		590		1.1	4.5
Perfluorooctane Sulfonamide (FOSA)		250		2.8	11
Perfluorooctanoic acid (PFOA)		2700		2.3	11
Perfluorooctane Sulfonate (PFOS)		570		0.85	4.5
Perfluoropentanoic acid (PFPA)		450		2.0	4.5
Perfluorotetradecanoic acid (PFTeA)		84		3.3	11
Perfluorotridecanoic Acid (PFTriA)		390		2.6	11
Perfluoroundecanoic acid (PFUnA)		1100		4.1	11
Surrogate		%Rec	Qualifier	Acceptance Limits	
13C8 PFOA		117		57 - 153	
13C8 PFOS		117		70 - 130	

Analytical Data

Client: Dalton Utilities

Job Number: 280-8415-1

Client Sample ID: AA2 18 MONTH

Lab Sample ID: 280-8415-4

Date Sampled: 10/12/2010 1401

Client Matrix: Solid

% Moisture: 38.0

Date Received: 10/14/2010 0900

DV-LC-0012 Perfluorinated Hydrocarbons

Method:	DV-LC-0012	Analysis Batch: 280-36437	Instrument ID:	LC_LCMS5
Preparation:	PFC leach	Prep Batch: 280-35882	Lab File ID:	pc50J18b104.d
Dilution:	1.0		Initial Weight/Volume:	10.17 g
Date Analyzed:	10/19/2010 1829		Final Weight/Volume:	50 mL
Date Prepared:	10/15/2010 0854		Injection Volume:	25 uL

Analyte	DryWt Corrected: Y	Result (ug/Kg)	Qualifier	MDL	RL
Perfluorobutane Sulfonate (PFBS)		1300		1.3	3.2
Perfluorobutanoic acid (PFBA)		170	B	0.54	3.2
Perfluorodecanoic acid (PFDA)		2300		1.2	3.2
Perfluorododecanoic acid (PFDoA)		500		1.3	7.9
Perfluoroheptanoic acid (PFHpA)		360		1.1	3.2
Perfluorohexane Sulfonate (PFHxS)		9.2		1.2	3.2
Perfluorohexanoic acid (PFHxA)		350		0.32	3.2
Perfluorononanoic acid (PFNA)		590		0.79	3.2
Perfluorooctane Sulfonamide (FOSA)		270		2.0	7.9
Perfluorooctanoic acid (PFOA)		2100		1.6	7.9
Perfluorooctane Sulfonate (PFOS)		410		0.60	3.2
Perfluoropentanoic acid (PFPA)		360		1.4	3.2
Perfluorotetradecanoic acid (PFTeA)		100		2.3	7.9
Perfluorotridecanoic Acid (PFTriA)		360		1.8	7.9
Perfluoroundecanoic acid (PFUnA)		900		2.9	7.9

Surrogate	%Rec	Qualifier	Acceptance Limits
13C8 PFOA	111		57 - 153
13C8 PFOS	106		70 - 130

Analytical Data

Client: Dalton Utilities

Job Number: 280-8415-1

Client Sample ID: AB5 12 MONTH

Lab Sample ID: 280-8415-5

Date Sampled: 10/12/2010 1416

Client Matrix: Solid

% Moisture: 30.0

Date Received: 10/14/2010 0900

DV-LC-0012 Perfluorinated Hydrocarbons

Method:	DV-LC-0012	Analysis Batch: 280-36437	Instrument ID:	LC_LCMS5
Preparation:	PFC leach	Prep Batch: 280-35882	Lab File ID:	pc50J18b105.d
Dilution:	1.0		Initial Weight/Volume:	10.76 g
Date Analyzed:	10/19/2010 1842		Final Weight/Volume:	50 mL
Date Prepared:	10/15/2010 0854		Injection Volume:	25 uL

Analyte	DryWt Corrected: Y	Result (ug/Kg)	Qualifier	MDL	RL
Perfluorobutane Sulfonate (PFBS)		1400		1.1	2.7
Perfluorobutanoic acid (PFBA)		150	B	0.45	2.7
Perfluorodecanoic acid (PFDA)		1700		1.0	2.7
Perfluorododecanoic acid (PFDoA)		390		1.1	6.6
Perfluoroheptanoic acid (PFHpA)		290		0.96	2.7
Perfluorohexane Sulfonate (PFHxS)		21		1.0	2.7
Perfluorohexanoic acid (PFHxA)		250		0.27	2.7
Perfluorononanoic acid (PFNA)		400		0.66	2.7
Perfluorooctane Sulfonamide (FOSA)		790		1.6	6.6
Perfluorooctanoic acid (PFOA)		1700		1.3	6.6
Perfluorooctane Sulfonate (PFOS)		950		0.50	2.7
Perfluoropentanoic acid (PFPA)		250		1.2	2.7
Perfluorotetradecanoic acid (PFTeA)		71		1.9	6.6
Perfluorotridecanoic Acid (PFTriA)		250		1.5	6.6
Perfluoroundecanoic acid (PFUnA)		700		2.4	6.6

Surrogate	%Rec	Qualifier	Acceptance Limits
13C8 PFOA	111		57 - 153
13C8 PFOS	128		70 - 130

Analytical Data

Client: Dalton Utilities

Job Number: 280-8415-1

Client Sample ID: AB13 6 MONTH

Lab Sample ID: 280-8415-6

Date Sampled: 10/12/2010 1428

Client Matrix: Solid

% Moisture: 60.8

Date Received: 10/14/2010 0900

DV-LC-0012 Perfluorinated Hydrocarbons

Method:	DV-LC-0012	Analysis Batch: 280-36437	Instrument ID: LC_LCMS5
Preparation:	PFC leach	Prep Batch: 280-35882	Lab File ID: pc50J18b106.d
Dilution:	1.0		Initial Weight/Volume: 10.54 g
Date Analyzed:	10/19/2010 1855		Final Weight/Volume: 50 mL
Date Prepared:	10/15/2010 0854		Injection Volume: 25 uL

Analyte	DryWt Corrected: Y	Result (ug/Kg)	Qualifier	MDL	RL
Perfluorobutane Sulfonate (PFBS)		2400		2.0	4.8
Perfluorobutanoic acid (PFBA)		320	B	0.82	4.8
Perfluorodecanoic acid (PFDA)		2300		1.8	4.8
Perfluorododecanoic acid (PFDoA)		440		2.0	12
Perfluoroheptanoic acid (PFHpA)		360		1.8	4.8
Perfluorohexane Sulfonate (PFHxS)		5.6		1.9	4.8
Perfluorohexanoic acid (PFHxA)		480		0.49	4.8
Perfluorononanoic acid (PFNA)		530		1.2	4.8
Perfluorooctane Sulfonamide (FOSA)		190		3.0	12
Perfluorooctanoic acid (PFOA)		2300		2.5	12
Perfluorooctane Sulfonate (PFOS)		500		0.91	4.8
Perfluoropentanoic acid (PFPA)		480		2.1	4.8
Perfluorotetradecanoic acid (PFTeA)		86		3.5	12
Perfluorotridecanoic Acid (PFTriA)		400		2.8	12
Perfluoroundecanoic acid (PFUnA)		980		4.4	12

Surrogate	%Rec	Qualifier	Acceptance Limits
13C8 PFOA	109		57 - 153
13C8 PFOS	120		70 - 130

Analytical Data

Client: Dalton Utilities

Job Number: 280-8415-1

General Chemistry

Client Sample ID: AA2 18 MONTH

Lab Sample ID: 280-8415-1

Client Matrix: Solid

Date Sampled: 10/12/2010 1401

Date Received: 10/14/2010 0900

Analyte	Result	Qual	Units	RL	RL	Dil	Method
Percent Moisture	44		%	0.10	0.10	1.0	D-2216
	Analysis Batch: 280-35870		Date Analyzed: 10/15/2010 0825				DryWt Corrected: N

Analytical Data

Client: Dalton Utilities

Job Number: 280-8415-1

General Chemistry

Client Sample ID: AB5 12 MONTH

Lab Sample ID: 280-8415-2

Client Matrix: Solid

Date Sampled: 10/12/2010 1416

Date Received: 10/14/2010 0900

Analyte	Result	Qual	Units	RL	RL	Dil	Method
Percent Moisture	33		%	0.10	0.10	1.0	D-2216
	Analysis Batch: 280-35870		Date Analyzed: 10/15/2010 0825				DryWt Corrected: N

Analytical Data

Client: Dalton Utilities

Job Number: 280-8415-1

General Chemistry

Client Sample ID: AB13 6 MONTH

Lab Sample ID: 280-8415-3

Client Matrix: Solid

Date Sampled: 10/12/2010 1428

Date Received: 10/14/2010 0900

Analyte	Result	Qual	Units	RL	RL	Dil	Method
Percent Moisture	57		%	0.10	0.10	1.0	D-2216

Analysis Batch: 280-35870 Date Analyzed: 10/15/2010 0825 DryWt Corrected: N

Analytical Data

Client: Dalton Utilities

Job Number: 280-8415-1

General Chemistry

Client Sample ID: AA2 18 MONTH

Lab Sample ID: 280-8415-4

Client Matrix: Solid

Date Sampled: 10/12/2010 1401

Date Received: 10/14/2010 0900

Analyte	Result	Qual	Units	RL	RL	Dil	Method
Percent Moisture	38		%	0.10	0.10	1.0	D-2216
Analysis Batch: 280-35870		Date Analyzed: 10/15/2010 0825		DryWt Corrected: N			

Analytical Data

Client: Dalton Utilities

Job Number: 280-8415-1

General Chemistry

Client Sample ID: **AB5 12 MONTH**

Lab Sample ID: 280-8415-5

Client Matrix: Solid

Date Sampled: 10/12/2010 1416

Date Received: 10/14/2010 0900

Analyte	Result	Qual	Units	RL	RL	Dil	Method
Percent Moisture	30		%	0.10	0.10	1.0	D-2216
	Analysis Batch: 280-35870		Date Analyzed: 10/15/2010 0825				DryWt Corrected: N

Analytical Data

Client: Dalton Utilities

Job Number: 280-8415-1

General Chemistry

Client Sample ID: AB13 6 MONTH

Lab Sample ID: 280-8415-6

Client Matrix: Solid

Date Sampled: 10/12/2010 1428

Date Received: 10/14/2010 0900

Analyte	Result	Qual	Units	RL	RL	Dil	Method
Percent Moisture	61		%	0.10	0.10	1.0	D-2216

Analysis Batch: 280-35870 Date Analyzed: 10/15/2010 0825 DryWt Corrected: N

Client: Dalton Utilities

Job Number: 280-8415-1

Surrogate Recovery Report

DV-LC-0012 Perfluorinated Hydrocarbons

Client Matrix: Solid

Lab Sample ID	Client Sample ID	PFOA %Rec	PFOS %Rec
280-8415-1	AA2 18 MONTH	107	89
280-8415-2	AB5 12 MONTH	111	106
280-8415-3	AB13 6 MONTH	117	117
280-8415-4	AA2 18 MONTH	111	106
280-8415-5	AB5 12 MONTH	111	128
280-8415-6	AB13 6 MONTH	109	120
MB 280-35882/1-A		113	102
LCS 280-35882/2-A		115	108
280-8066-A-6-D MS		117	102
280-8066-A-6-E MSD		114	118

Surrogate	Acceptance Limits
PFOA = 13C8 PFOA	57-153
PFOS = 13C8 PFOS	70-130